

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:

Ardenvoir Post Office
Ardenvoir, Washington 98811

Docket No. A2012-11

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(December 8, 2011)

On October 13, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked September 30, 2011 from postal customer Christine Mallon on behalf of customers of the Ardenvoir Post Office ("Petitioners"), objecting to the discontinuance of the Post Office at Ardenvoir, Washington. On October 14, 2011, the Commission issued a Form 56, Notice of Filing under 39 U.S.C. § 404(d). On October 19, 2011, the Commission issued Order No. 910, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 910, the administrative record was filed with the Commission on October 27, 2011. On November 2, 2011, Petitioner Christine Mallon filed a letter regarding the Ardenvoir Post Office discontinuance. Petitioner Christine Mallon thereafter filed a Participant Statement on November 18, 2011 on behalf of customers of the Ardenvoir Post Office. Petitioner John D. Mallon filed a Participant Statement on November 22, 2011. The following is the Postal Service's answering brief in support of its decision to discontinue the Ardenvoir Post Office.

The appeal received by the Commission on October 13, 2011, raises three main issues: (1) the effect on postal services, (2) the impact upon the Ardenvoir community,

and (3) the economic savings expected to result from discontinuing the Ardenvoir Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. Additionally, consistent with the Postal Service's statutory obligations and Commission precedent,¹ the Postal Service gave consideration to a number of other issues, including the impact on employees. Accordingly, the determination to discontinue the Ardenvoir Post Office should be affirmed.

Background

The Final Determination to Close the Ardenvoir, MS Post Office and Extend Service by Highway Contract Route Service (FD), as well as the administrative record, indicate that the Ardenvoir Post Office provides EAS-11 level service to 63 Post Office Box and general delivery customers, and no other delivery customers. The office is open for 27.5 hours per week.² The Postmaster of the Ardenvoir Post Office retired on September 30, 2008.³ A noncareer postmaster relief (PMR) was assigned to the Ardenvoir Post Office. Upon implementation of the Final Determination, the noncareer PMR may be separated from the Postal Service; however, attempts will be made to reassign the employee to a nearby facility.⁴ The average number of daily retail window transactions at the Ardenvoir Post Office is 14. Revenue has declined: \$23,407.00 in

¹ See 39 U.S.C. 404(d)(2)(A).

² In these comments, specific items in the administrative record are referred to as "Item ____." FD at 2; Item No. 42, (Form 4920) Revised Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"), at 1

³ Petitioner notes that Item No. 42, Proposal and FD incorrectly state that the Postmaster retired on October 2, 2009. These documents should state that the Postmaster retired on September 30, 2008.

⁴ Petitioner notes that Item No. 42, Proposal, and FD incorrectly state that an Officer in Charge ("OIC") was installed to operate the office. These documents should state that a noncareer PMR was assigned to the Ardenvoir Post Office.

FY 2008 (61 revenue units); \$22,151.00 in FY 2009 (58 revenue units); and \$20,857.00 in FY 2010 (54 revenue units).⁵ The Ardenvoir Post Office has no permit mailer or postage meter customers.⁶ Upon implementation of the final determination, delivery and retail services will be provided by highway contract route delivery under the administrative responsibility of the Entiat Post Office, an EAS-15 level office located approximately 12 miles away, which has 86 available P.O. Boxes. Delivery service will be provided to Cluster Box Units (CBUs) installed on the carrier's line of travel.⁷ Customers also have the option of electing to have delivery to roadside mailboxes installed on the carrier's line of travel.

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Ardenvoir Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and FD, customers received notice through other means. Questionnaires were distributed to P.O. Box customers of the Ardenvoir Post Office. Questionnaires were also available over the counter for retail customers at Ardenvoir.⁸ A letter from the Manager of Post Office Operations, Seattle, WA, was also made available to postal customers. The letter advised customers that the Postal Service was evaluating whether the continued operation of the Ardenvoir Post Office was warranted, and that effective and regular service could be provided through highway contract route service and retail services

⁵ FD at 2; Item No. 42, Revised Fact Sheet, at 1; Item No. 33, Proposal, at 2.

⁶ FD at 2; Item No. 42, Revised Fact Sheet, at 1; Proposal at 2.

⁷ FD at 2 and 6-7; Item No. 15, Post Office Survey Sheet, at 1; Item No. 41, Proposal, at 2.

⁸ FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Ardenvoir Post Office, at 1.

available at the Entiat Post Office. The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving highway contract route service delivery.⁹ The returned customer questionnaires and Postal Service response letters appear in the administrative record in Item No. 22.¹⁰

Representatives from the Postal Service were available at the Entiat Library for a community meeting on May 9, 2011, to answer questions and provide information to customers.¹¹ Customers received formal notice of the Proposal and FD through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Ardenvoir Post Office and the Entiat Post Office from May 31, 2011 to August 1, 2011.¹² The FD was posted at the same two Post Offices beginning on

⁹ Item No. 21, Letter to Customer, at 1.

¹⁰ The Petitioners claim that the Postal Service provided “blanket statement” responses to community concerns. However, the Administrative Record reflects that while some answers may be “standard” to the extent that these questions have been posed in other discontinuance dockets, the answers provided are responsive to the concerns raised. Moreover, the Postal Service notes that the record in this proceeding is very extensive, consisting of customer comments and the Postal Service’s responses to customer feedback. Under these circumstances, criticism about the Postal Service’s failure to make an independent inquiry is simply not supported.

¹¹ Petitioner John Mallon notes that the community meeting was held on a Monday, which is not a good time to have all of the members of the community present. He states that if a second meeting took place on a Saturday at 2:00 p.m., then more residents could attend and it would not interfere with their employment. The Postal Service notes that its internal regulations give local discontinuance coordinators flexibility in determining meeting times that encourage customer participation. See Handbook PO-101 § 251. No single time is ever consistent with all customer preferences; hours within an office’s normal hours of operation generally suit customers who routinely visit that office, while inconveniencing customers who only occasionally visit the office, thereby conflicting with their work hours in many cases. Evening or weekend hours may suit the occasional customers, while inconveniencing regular customers. That is one reason why a discontinuance study process affords customers multiple avenues for providing their input: questionnaires, community meeting, written correspondence at any time, and if those opportunities do not suffice, then formal comments on a proposal posted for 60 days provide another means for submission of customer input. FD at 2; Item No. 21, Letter to Customer, at 1; Item No. 24, Community Meeting Roster; Item No. 25, Community Meeting Analysis; Proposal, at 2.

¹² FD at 2; Proposal at 7.

September 8, 2011, as confirmed by the round-dated FD cover sheets that appear in the administrative record.¹³

In light of a postmaster vacancy, minimal workload, low volume, declining revenue,¹⁴ the variety of delivery and retail options (including the convenience of highway contract route service delivery and retail service),¹⁵ no recent growth in the area,¹⁶ minimal impact upon the community, and the expected financial savings,¹⁷ the Postal Service issued the FD.¹⁸ Regular and effective postal services will continue to be provided to the Ardenvoir community in an effective manner upon implementation of the Final Determination.¹⁹

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Ardenvoir Post Office on postal services provided to Ardenvoir customers. The closing is premised upon providing regular and effective postal services to Ardenvoir customers.

¹³ Petitioner Christine Mallon expressed a concern that the final determination posted did not clearly include/post an invitation for comments with a round date. However, the invitation for comments is posted with the proposal, not the final determination under Handbook PO-101.

¹⁴ See note 5 and accompanying text.

¹⁵ FD at 2-7; Proposal, at 2-7.

¹⁶ Item No. 16, Community Survey Sheet.

¹⁷ FD at 2 and 6; Item No. 17, Highway Contract Route Cost Analysis; Item No. 42, Revised Fact Sheet, at 1; Item No. 29, Proposal Checklist, at 1-2; Proposal at 2 and 6.

¹⁸ FD at 2-7.

¹⁹ FD at 2.

The Petitioners, in their letter of appeal and Participant Statement, raise the issue of whether the Postal Service can continue to provide effective and regular postal services to the Ardenvoir community. They note the convenience of the Ardenvoir Post Office and requesting its retention. Petitioners express particular concern about Ardenvoir losing its community identity, as well as the impact closing the Ardenvoir Post Office would have on its citizens, particularly access for seniors. Each of these concerns was considered by the Postal Service.

The effect of the closing of the Ardenvoir Post Office on the availability of postal services to Ardenvoir residents was considered extensively by the Postal Service.²⁰ Upon the implementation of the Final Determination, services provided at the Post Office, such as the sale of stamps, envelopes, postal cards, and money orders, will also be available from the carrier.²¹ Customers opting for carrier service will not have to pay post office box fees.²² Carrier service also is beneficial to many senior citizens, citizens lacking transportation, and those who face special challenges because they do not have to travel to the Post Office for service.²³ They have the option of meeting the carrier at the CBU or roadside mailbox to transact business, although it is not always necessary to be present to conduct most Postal Service transactions.²⁴

Petitioners express concern that they do not have access to the internet. However, services are also available for those customers who do not have computers. Stamps by Mail and Money Order Application forms are also available for customer

²⁰ FD at 2-7; Proposal at 2-6.

²¹ FD at 2-7; Proposal at 2-7; Item No. 21, Notice to Customers, at 2.

²² FD at 5; Proposal at 5.

²³ FD at 2-5; Proposal at 2-5.

²⁴ FD at 2 and 6-7; Item No. 15, Post Office Survey Sheet, at 1; Item No. 41, Proposal, at 2..

convenience, and stamps are also available at many stores and gas stations, or by calling 1-800-STAMP-24.²⁵ Customers can also request special services, such as certified, registered, or Express Mail, delivery confirmation, signature confirmation, and COD from the carrier. Customers who desire such special services may obtain them from the carrier, who will estimate cost, provide a receipt, and bring change or a bill for the remaining amount the next delivery day (or the customer may leave a note with the appropriate payment and the carrier will leave a receipt the next day).²⁶

Petitioners raise concerns about access to and safety of mail receptacles.²⁷ The Postal Service explained that CBUs are secure, free-standing units of individually locked mail compartments that are provided, installed and maintained by the Postal Service at no cost to customers, and with keys provided to customers by the Postal Service. However, if a customer elects to erect a mailbox, the customer is responsible for mailbox installation and maintenance. Mailboxes must be placed in such a way that they may be safely and conveniently served by the carrier and should conform to state laws and highway regulations. Customers electing for service at roadside mailboxes may contact the administrative postmaster to determine the proper mailbox location and installation method that would help alleviate this concern. Placing the mailbox on a long, horizontal, swinging pipe is one method often used to avoid damage by snowplows. The Postal Service also notes that safety of customer access is routinely considered in connection with curbside delivery. Specifically, Postal Operations Manual

²⁵ FD at 4; Proposal at 4; Item No. 38, Returned Optional Comment Forms and USPS Response Letters; at 1 and 4; Item No. 40, Analysis of 60-Day Posting Comments, at 1.

²⁶ Item No. 38, Returned Optional Comment Forms and USPS Response Letters, at 2; Item No. 40, Analysis of 60-Day Posting Comments, at 1.

²⁷ FD at 3-4.

§ 631.32 provides that “[d]elivery may be provided to boxes at the curb so they can be safely and conveniently served by the carrier from the carrier’s vehicle, and so that customers have reasonable and safe access. Mail receptacles may be grouped, two to a property line where possible.”

Petitioners express concern that service to CBUs would not be as effective as P.O. Box service due to inclement weather. While inclement weather conditions are a factor in delivering mail to, and collecting mail from, CBUs, they are also a factor for P.O. Box customers who must traverse parking areas and sidewalks to obtain their mail.

Petitioners also express concern about senior citizens and those with disabilities who are unable to travel to the nearby Post Office to pick up their mail. The record explains, however, that carrier service is beneficial to many senior citizens and those who face special challenges because they do not have to travel to the Post Office for most services.²⁸ They have the option of meeting the carrier at the box to transact business, although it is not always necessary to be present to conduct most Postal Service transactions.²⁹ Special provisions are made for hardship cases or special customer needs. Customers may contact the postmaster at the Entiat Post Office for more information about requesting an exception for hardship delivery.³⁰

With respect to Petitioners’ concern about the receipt of about package delivery and pickup, the Postal Service explained it will deliver packages that fit in the customer’s rural mailbox. If the package does not fit in the rural mailbox, the carrier will attempt delivery of package to a designated place such as the customer’s porch or

²⁸ FD at 3-5; Proposal at 3-5.

²⁹ FD at 3-5; Proposal at 3-5.

³⁰ FD at 2-3 and 5; Proposal at 2-3 and 5.

carport if the customer lives less than one-half miles from the line of travel.³¹ If the customer lives over one-half mile away or is not home when delivery is attempted, packages will be left outside the mailbox or at a location designated by the customer (if authorized by the customer), or a notice will be left in the mailbox. Attempted delivery items will be taken back to the administrative Post Office. Customers may pick up the item at the Post Office, request redelivery on another day or authorize delivery to another party.

Petitioners express concern over the dependability of rural route service emanating from the Entiat Post Office, particularly for those residents who serve in the military. The Postal Service notes that rural carriers have earned the respect of the American public through many years of dedication to the Postal Service and to postal customers and that during national and local emergencies, including prolonged periods of extreme weather conditions, rural carriers have demonstrated great responsibility in providing mail service to postal customers.

Petitioners also express concern about mail security. The issue of mail security was raised during the feasibility study and addressed in the administrative record.³² The Postal Service researched this risk and found that there have not been any reports of vandalism in the area.³³ Individual locking mail receptacles are available at home improvement stores and the Postal Service may be able to supply and install large 16 unit CBUs for group locations.³⁴ Customers were advised that all individual mail

³¹ FD at 4; Proposal at 4.

³² FD at 3 and 4; Proposal at 3 and 5.

³³ Item No. 14, Inspection Service/local law enforcement vandalism reports.

³⁴ FD at 5; Proposal at 5.

receptacles should be installed according to Postal Service guidelines and standards in a location that the Postmaster of Entiat approves. Customers were advised that they can put a lock on their mailbox as long as the slot is large enough to accommodate their normal mail volume.³⁵ CBUs also offer the security of individually locked mail compartments.³⁶ While carrier delivery will be made to roadside mailboxes or CBUs in the carrier's line of travel, customers concerned about security risks may still opt for Post Office Box service at the nearby Entiat Post Office.

Thus, the Postal Service has properly concluded that all Ardenvoir customers will continue to receive regular and effective service via highway contract route services delivery to CBUs or roadside mailboxes installed on the carrier's line of travel.

Effect Upon the Ardenvoir Community

The Postal Service is obligated to consider the effect of its decision to close the Ardenvoir Post Office upon the Ardenvoir community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Ardenvoir is an unincorporated rural community located in Chelan County. The community is not administered politically by a local government. Police protection is provided by the Chelan County Deputy and fire protection is provided by the Forest

³⁵ FD at 3; Proposal at 3.

³⁶ FD at 5; Proposal at 5.

Service or Fire District.³⁷ The community is comprised of vacation homes in a forest setting. Some residents are year round and others telecommute to work in nearby communities and work in local businesses. The questionnaires completed by Ardenvoir customers indicate that, in general, they may travel elsewhere for some supplies and services.³⁸

The Petitioners' letters raise the issue of the effect of the closing of the Ardenvoir Post Office upon the identity of the Ardenvoir community. This issue was considered by the Postal Service, as reflected in the administrative record.³⁹ Communities generally require regular and effective postal services and these will continue to be provided to the Ardenvoir community. In addition, the Postal Service has concluded that nonpostal services provided by the Ardenvoir Post Office can be provided by the Entiat Post Office. Government forms usually provided by the Post Office are also available by contacting local government agencies.⁴⁰

Petitioners also expressed a concern that the loss of the Post Office would have a detrimental effect on the business community, including the future closing of the Cooper's Store and other adjacent businesses.⁴¹ There is no indication that the Ardenvoir business community will be adversely affected. Businesses generally require regular and effective postal services and these will continue to be provided to the Ardenvoir business community. The questionnaires completed by Ardenvoir

³⁷ FD at 6; Proposal at 6.

³⁸ See generally FD at 5; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 1-67.

³⁹ FD at 2 and 6; Proposal, at 2 and 6.

⁴⁰ FD at 4; Proposal at 5.

⁴¹ FD at 6; Proposal at 6.

customers indicate that, in general, they will continue to use local businesses if the Ardenvoir Post Office is closed.⁴²

Petitioners also contend that the Postal Service is stripping rural America of its Post Offices and that there is a disparate impact in rural America and in the Ardenvoir community. The Postal Service notes, however, that Post Offices are reviewed on a case-by-case basis. When there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternative means. This analysis is not limited to Post Offices. Retail units in urban areas are also considered for closure. In fact, the Postal Service is in the process of analyzing closing numerous retail facilities located in urban facilities. See PRC Docket No. N2011-1. In this case, it was determined that the Postal Service could continue to provide a maximum degree of effective and regular postal services to the community through cost effective means.⁴³

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Ardenvoir Post Office on the community served by the Ardenvoir Post Office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that highway contract route delivery service would cost the Postal Service less than maintaining the Ardenvoir Post Office and would still provide regular

⁴² FD at 6; Proposal, at 6; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 1-95.

⁴³ FD at 6; Proposal at 6.

and effective service.⁴⁴ The estimated annual savings associated with discontinuing the Ardenvoir Post Office are \$42,159, less a one time expense of \$3,000 to install the CBUs.⁴⁵

The Petitioners' letters of appeal suggest strategies that might reduce cost at the Ardenvoir Post Office, such as reducing the number of hours the Ardenvoir Post Office operates or increasing the P.O. Box fees. The Postal Service has broad experience with similar options. However, in this case, it has determined that carrier service, coupled with service at the nearby Entiat Post Office, is a more cost-effective solution than maintaining the Ardenvoir postal facility and career position. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations.

Petitioners also claim that the economic savings calculation does not account for loss of revenue from P.O. Boxes. This concern presumably only pertains to customers that switch from P.O. Box service to rural carrier. However, revenue from P.O. Box service is a relatively small proportion of an office's total revenue, and hence the impact of any such conversions would be trivial in relation to total savings. See Docket No. N2011-1, USPS-T-1.

The Petitioners also state that the savings estimate does not account for additional hours and mileage for the highway contract carrier. However, the cost

⁴⁴ Item No. 21, Letter to Customer, at 1.

⁴⁵ Page 6 of the FD indicates that there will be a one-time fee of \$3000 for movement of the facility. This should state that there will be a one-time fee of \$3000 for the installation of CBUs. Item No. 15, Postal Office Survey Sheet, at 2. FD at 6; Proposal, at 6.

estimate includes a deduction of \$3,500 for the annual cost of replacement service.⁴⁶

The Postal Service reached this figure by calculating the cost of delivering to an additional 40 boxes and adding 3 miles to a route.⁴⁷

Petitioners state that the “errors in the year of retirement and the pay-scale of the replacement for three years therefore compromises the Section IV Economic Savings breakdown for wages...too high...and thus reduces the savings claimed by the Postal Service.” The savings resulting from the Postmaster vacancy in the Economic Savings section is calculated on an annual basis and is not based on the number of years the position was vacant. Thus, the number of years the position actually is vacant does not affect the annual savings calculation reflected in the FD. Additionally, the economic savings calculation conducted as a part of a discontinuance study is forward-looking; that the Postal Service may have paid less in salary and benefits over the past years to a noncareer employee does not mean that it could count on those savings annually in the future. If the Ardenvoir Post Office closes, one career slot will be eliminated. If the Post Office is not discontinued, that slot would have been filled with a career employee not an OIC, and the salary and benefits to be paid would be as shown for a postmaster. Thus, it was appropriate to use a career Postmaster’s salary in the annual savings calculation because the career position would have ultimately been filled if the Ardenvoir Post Office had not been identified as a candidate for discontinuance.

In the Participant Statement, Petitioners challenge the FD on grounds that there is only a small amount of savings that will be achieved by discontinuing the Ardenvoir

⁴⁶ FD at 6; Proposal at 6.

⁴⁷ Item No. 17, Highway Contract Route Cost Analysis Form.

Post Office. The Postal Service is looking at all opportunities to operate efficiently and provide effective and regular service. While the savings from any given initiative may seem small, these savings can make a difference when added together with other initiatives.

Petitioners also question the consistency of this discontinuance action with provisions in Title 39. Pursuant to 39 U.S.C. § 404(d)(2)(A)(iii), the Postal Service in determining whether to close a Post Office must consider whether such closing is consistent with the policy that the Postal Service provide “a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.” The Postal Service's view is that the "maximum degree" obligation in section 101(b) must be read in the context of related statutory provisions. It is a directive to recognize that special consideration must be given to the greater likelihood of dependence on postal retail facilities for access to postal products and services in rural communities and small towns; however, this concern must be balanced with Congressional mandates that the Postal Service execute its mission efficiently and economically. See sections 101(a); 403(a), (b)(1) and (b)(3); 404(d)(2) and 3661(a). Here, the Postal Service then analyzed whether a maximum degree of effective and regular postal services to the area and community could be provided with rural delivery service in the absence of the Post Office, and the answer was affirmative.

Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies,

which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).⁴⁸ The Postal Service determined that highway contract route service is more cost-effective than maintaining the Ardenvoir postal facility and postmaster position.⁴⁹ The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The Postmaster retired on September 30, 2008. A PMR was assigned to the Ardenvoir Post Office. Upon implementation of the Final Determination, the noncareer PMR may be separated from the Postal Service; however, attempts will be made to reassign the employee to a nearby facility.⁵⁰ The record shows that no career employees would be adversely affected by this closing.⁵¹

Therefore, in making the determination, the Postal Service considered the effect of the closing on the career employees at the Ardenvoir Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Ardenvoir Post Office on the provision of postal services and on the Ardenvoir

⁴⁸ FD at 6; Proposal at 6.

⁴⁹ FD at 2; Proposal at 2.

⁵⁰ FD at 2 and 6.

⁵¹ FD, at 2 and 5; Item No. 15, Post Office Survey Sheet, at 1; Proposal, at 2 and 6.

community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Ardenvoir customers.⁵² The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Ardenvoir Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Ardenvoir Post Office be affirmed.

Respectfully submitted,

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⁵² FD at 6.

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